EXHIBIT B



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)

R.18-10-007 (Issued October 25, 2018)

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) 2019 WILDFIRE SAFETY PLAN COMPLIANCE REPORT

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Dated: April 7, 2020

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PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) 2019 WILDFIRE SAFETY PLAN COMPLIANCE REPORT

Pacific Gas and Electric Company ("PG&E") respectfully submits its 2019 Wildfire Safety Plan Compliance Report ("Report") submitted to Caroline Thomas Jacobs, Director of the Wildfire Safety Division, California Public Utilities Commission ("CPUC") on March 31, 2020 and served on all parties to service list R.18-10-007 on April 1, 2020 (Attachment A). On April 7, 2020, Administrative Law Judge Sarah Thomas directed PG&E to file its Report with CPUC Docket Office (Attachment B).

Respectfully Submitted,

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By: /s/ Alyssa Koo

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ATTACHMENT A



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March 31, 2020

VIA E-MAIL CAROLINE.THOMASJACOBS@CPUC.CA.GOV

Caroline Thomas Jacobs, Director Wildfire Safety Division California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Dear Ms. Jacobs:

In accordance with Public Utilities Code ("PUC") Section 8386.3, PG&E is providing this report on its compliance with its 2019 Wildfire Safety Plan.

I. SUMMARY OF PG&E'S 2019 WILDFIRE MITIGATION PLAN PERFORMANCE

PG&E's highest responsibility is the safety of its customers and the communities it serves. PG&E's comprehensive 2019 Wildfire Safety Plan ("Plan") expanded and enhanced the additional safety precautions PG&E adopted after the 2017 and 2018 wildfires to address the growing threat of extreme weather and wildfires across its service area. Our top electric business priority in 2019 was to meet the specific targets and metrics set forth in that Plan. These targets and metrics include the expansion and execution of the PSPS program, repairing high-priority conditions identified during Wildfire Safety Inspection Program ("WSIP") inspections in Tier 2 and Tier 3 HFTD areas, and other wildfire mitigation measures such as enhanced vegetation management (EVM), system hardening, and improved situational awareness.

PG&E tracks and reports to the CPUC on the progress relating to 53 commitments made in the 2019 Plan. Those commitments include but go beyond the 11 high-level targets set forth in Section 6.2 of the Plan, titled "Plan Performance and Evaluation." (See Pacific Gas and Electric Company Amended Wildfire Safety Plan, dated February 6, 2019 and filed on February 14, 2019, at 131-36.)

PG&E sent the CPUC an end-of-year status update on January 15, 2020, reviewing the status of all 53 commitments. As noted in that report, PG&E completed or exceeded 46 of the 53

¹PUC § 8386.3(c)(1): Three months after the end of an electrical corporation's initial compliance period as established by the Wildfire Safety Division pursuant to subdivision (b) of Section 8386, and annually thereafter, each electrical corporation shall file with the division a report addressing its compliance with the plan during the prior calendar year.

commitments made in the 2019 Plan and substantially completed 3 more. Attachment A provides the detailed January report with a few minor updates incorporated due to subsequent quality reviews of the data.²

While PG&E experienced many challenges in implementing our 2019 Plan, we accomplished the essential purpose of the plan -- to reduce the risk of catastrophic wildfire for the customers and communities we serve. We have made significant progress in enhancing our organizational and system readiness and responsiveness to the increased threat of potential wildfires across our service territory. The number of utility-caused wildfires in high fire-threat areas of PG&E's service territory declined materially in 2019 and there was no repeat of the deadly catastrophic wildfires that devastated Northern California in 2017 and 2018. Most significantly, no utility-caused wildfire in our service territory led to a loss of life in 2019. Moving into 2020 and beyond, we are working to sustain and build on this progress for the benefit of all Californians while minimizing disruption to customers to the extent possible.

II. DETAILS OF SPECIFIC COMMITMENTS

Seven of the 53 commitments made in the Plan in early 2019 were not fully completed by the end of the year. Three of those commitments were substantially completed by the end of 2019. In addressing the other four commitments, PG&E developed mitigations that differed from the specifics of each commitment but satisfied the underlying purpose of reducing wildfire risk. All seven are discussed below.

Commitments Substantially Completed:

WSIP Distribution Corrective Actions (item 1.7 in attachment A): PG&E completed 100 percent of its WSIP inspections of distribution poles (inspecting 694,250 poles) in HFTD areas in August 2019; the original commitment was to complete all inspections by May 31, 2019. As of the end of 2019 we completed almost all (97%; 4,881 out of 5,046) of the high-priority corrective actions identified by those inspections, including all Priority Code A notifications. Only 165 Priority Code B notifications remained open. The original Plan commitment was to complete all identified high-priority corrective actions by June 30, 2019. As previously reported to the CPUC, we were unable to meet those commitments in full by the target dates due to a combination of factors, including inclement weather; limitations on availability of equipment, materials, and qualified personnel; and legal and regulatory issues including objections from

² The minor updates comprise the following:

^{1.2} Transmission Corrective Actions: Validated Work Completion updated from 93% to 91%;

^{1.7} Distribution Corrective Actions: Validated Work Completion updated from 96% to 97%;

^{3.2} EVM Circuit Miles: Validated Work Completion updated from 103% to 102%;

^{3.3 &}amp; 3.5 CEMA Inspections: Validated Work Completion updated from 81% to 76%; and

^{6.1} Response, Recovery and Restoration: year-end status updated to purple "Completed Late" from blue "Completed"; while rebuild and recovery plans were operationally in place by June 1, 2019, PG&E updated its wildfire response and post-incident recovery capabilities, documented in the Company Emergency Response Plan (CERP) as of September 26, 2020.

property owners or governmental agencies and environmental permitting requirements.³ We have established and implemented a risk-based prioritization to complete the remaining work in 2020.

CEMA Inspections (item 3.3): In addition to the annual vegetation management inspection of all its distribution lines, PG&E's Plan committed to complete all CEMA inspections within the program scope. In 2019, PG&E completed CEMA patrols on ~35,000 line-miles of distribution lines, covering about 76 percent (on a mileage basis) of the originally planned CEMA inspections. This means that while all electric distribution lines were inspected at least once in 2019, 24 percent of distribution lines within the CEMA program were not inspected a second time as originally planned. For those line miles within the scope of the CEMA program that did not receive a separate CEMA patrol in 2019, PG&E may perform an additional mid-cycle inspection in 2020 depending on (among other things) the time between the last routine inspection in 2019 and the next scheduled CEMA or routine inspection.

Assessment of Trees with Strike Potential (item 3.5): PG&E committed in its Plan to assess the estimated more than 100 million trees with a potential strike path to PG&E power lines during CEMA patrols in 2019. As noted above, we completed separate CEMA inspections for approximately 76 percent of all originally planned CEMA inspections on a mileage basis in 2019. Through routine and CEMA inspections in 2019 PG&E identified over 56,000 dead or dying trees to be worked and completed that work on over 48,000 of those trees. As noted above, we may perform an additional mid-cycle inspection in 2020 for the ~10,000 miles of line that were not CEMA-patrolled in 2019.

Commitments Not Completed and Associated Mitigations:

WSIP Transmission Corrective Actions (item 1.2): We committed to complete visual and drone inspections on all WSIP transmission (~5,500 line-miles with 49,715 total structures) by May 1, 2019, and to complete high-priority corrective actions identified by those inspections by May 31, 2019. PG&E completed visual *or* aerial (helicopter or drone) inspections of 100 percent of its transmission poles and towers in HFTD areas in May 2019 and completed 100 percent of visual *and* aerial inspections of all structures in December 2019. We were unable to perform all of the corrective repairs by May 31, 2019, due to factors including inclement weather; limited availability of equipment, materials and qualified personnel; and legal and regulatory issues including objections from property owners or governmental agencies and environmental permitting requirements. However, we completed 93 percent of the more than 5,000 high-priority corrective actions, including all Priority Code A notifications, by December 31, 2019.

Several factors obstructed the completion of repairs on the \sim 500 Priority B asset tags in 2019, including limited time periods during which we could take lines out of service to perform required work and the diversion of line crews to work PSPS events rather than perform repairs.

³ PG&E has provided the CPUC with periodic status updates on its WSP commitments, including the status of its completion of inspections and high-priority corrective actions, beginning May 2019.

To reduce the risk of the pending repairs, we have risk-prioritized the rest of these repairs for completion in 2020.

Quality of WSIP Distribution Inspections (item 1.8): In 2019, we validated the quality of WSIP transmission and distribution inspections and reported on findings that represented non-conformance to a policy, procedure, or standard. For WSIP inspections of transmission and distribution assets, we targeted a 98 percent rate to "meets expectations" during these reviews. At 2019 year-end, 96.7 percent of audited WSIP distribution inspections yielded no high- or medium-risk findings and therefore complied with the "meets expectations" performance rating. To mitigate any risk created by missing this target, PG&E commissioned an independent third-party evaluation of the WSIP inspections and engaged in a quality assessment effort that included thousands of re-inspections to ensure quality completion of all inspections. We are incorporating the process improvements and lessons learned from that effort into our 2020 inspection program.

Quality of EVM Work (item 3.6): The 2019 Plan committed to perform work verification on every mile of EVM work completed in the field in 2019, with a target of achieving a 92 percent rate of "meets expectations" performance in these reviews. The "first pass" quality results of this work verification process were approximately 60 percent for the year. To ensure we mitigated any "first pass" quality issues, we reworked all of the distribution line-miles that did not pass the initial work verification. Each reworked mile was then re-examined and verified to "meet expectations" before we moved it to completed status. As a further process quality check, we implemented an additional Quality Assurance review in October 2019 to assess the quality of the work verification process, sampling about 9 percent of all EVM work completed in 2019 (approximately 230 miles of EVM work that had passed work verification and were considered complete). These QA assessments found that 98 percent of the sampled work-verified miles that had been designated as complete had in fact been properly assessed and worked according to our company standard.

PSPS Re-energization Strategy (item 4.4): PG&E's 2019 Plan stated that it would "patrol all facilities de-energized during a PSPS event to identify any damage that needs to be repaired before re-energizing." That target was not met as originally framed, because we executed a different PSPS re-energization strategy in 2019 relative to the strategy described in the Plan (which had been developed in early 2019). As clarified in our second amendment to the Wildfire Safety Plan (submitted to the CPUC on April 25, 2019), our ultimate 2019 strategy was to patrol all lines that were within the PSPS weather and fire risk zone before post-PSPS re-energization, and to exercise operational judgment to determine whether to patrol other lines that were interrupted only as a secondary effect of the de-energization of other lines.

PG&E continued to uphold the standard that we would only restore power following a PSPS event after confirming that it was safe to do so. The original Plan language – that PG&E would patrol all facilities or "protection zones" before re-energization – arose from PG&E's 2018 PSPS program. However, the 2019 Plan expanded the scope of the PSPS program to include high voltage transmission lines. When high voltage transmission lines within the weather and fire risk

zone are de-energized during a PSPS event, that often causes other transmission lines and distribution lines connected to the source line – potentially far from the original fire-risk areas – to be de-energized as well. Thus, distribution lines far from HFTD areas that triggered the PSPS event, but which rely on the de-energized lines for power, such as lines in cities like San Francisco or San Jose, could be de-energized. Our Plan did not intend to require patrols of lines far from the at-risk areas after a PSPS event for two reasons: first, those lines were only de-energized because of electric system configuration rather than because they were exposed to weather and fire risk; and, second, because patrolling lines that had not been exposed to potential weather risk and fire damage would have further delayed restoring power to impacted customers. Therefore, PG&E exercised operational judgment to only patrol lines directly within the high weather and fire risk areas and reenergize all affected lines as soon as it was safe to do so.

III. CHALLENGES EXPERIENCED

Our 2019 Wildfire Safety Plan proposed the completion of work at an unprecedented scale and speed. That Plan acknowledged that there were significant execution risks to accomplishing the scope of planned work, from external and internal sources. These challenges, outlined in Table 9 of the Plan, include inclement weather, the availability of equipment, materials, and qualified personnel, and legal/regulatory issues that could affect our ability to complete all of the necessary work outlined in the Plan.⁴

Several of the external execution risks identified did in fact create challenges or delays in 2019. Unusually heavy snowfall and storms through the early part of 2019 delayed our crews from accessing, inspecting, and repairing a small percentage of distribution and transmission poles and towers under the WSIP program. Despite our extensive, proactive outreach, land-owner refusals and environmental permitting challenges limited our ability to complete some Enhanced Vegetation Management and WSIP corrective actions. Throughout 2019 we developed contingency plans and mitigations to address potential challenges, including acquiring additional resources (particularly for enhanced vegetation management and system hardening) and adding additional oversight, support and outreach efforts to try to overcome potential delays and obstructions to planned work.

IV. LESSONS LEARNED

We have learned many lessons from the execution of the 2019 Wildfire Safety Plan, and received extensive feedback from customers, communities and other stakeholders. We are continuing to identify and incorporate these lessons learned into our 2020 Wildfire Mitigation Plan and the associated program targets. Some key lessons include:

• Enhanced Vegetation Management: We are re-balancing VM activities to use VM labor resources more effectively in the years ahead. In particular, we are shifting resources to expand rights of way on lower voltage transmission lines, for the double

⁴ PG&E Plan at p. 2, see also Table 9 at pp. 39-46 (identifying the major risks for each target).

benefit of reducing wildfire risk and possibly reducing the footprint of future PSPS events.

- Enhanced Inspections: We performed enhanced inspections of all poles and structures within HFTDs in 2019. Building on that inspection foundation, we are adopting a risk-informed inspection process going forward. We have incorporated enhanced inspection processes and tools from 2019 into our Routine Asset Inspection Program. Starting in 2020, we will inspect facilities in HFTD Tier 3 annually and inspect Tier 2 facilities on a 3-year cycle. This will use inspection resources more cost-effectively and facilitate a thorough understanding of asset conditions in the high fire threat areas.
- **System Hardening:** Building on operational insights and system hardening work from the second half of 2019, we are increasing system hardening line-miles by over 40 percent starting in 2020.
- **PSPS Scope Mitigations:** Based on analysis of the 2019 PSPS events, we will use automated sectionalization measures and transmission impact analyses to reduce the size of PSPS events for the 2020 wildfire season. We will also use microgrids and distributed generation to support some communities in PSPS zones. These efforts are expected to reduce 2020 PSPS customer impacts by one third relative to comparable fire-risk events in 2019.
- **PSPS Duration Reduction:** Building on the operational practices and insights from 2019, we are adding resources and modifying post-event asset inspection processes and fire condition monitoring to speed post-event system restoration.

PG&E anticipates that the programs and approaches described in our 2020 WMP will continue to evolve to reflect new insights, risks, and opportunities. Wildfire risk is not static, nor are PG&E's efforts to mitigate that risk. PG&E will continue learning, iterating and improving our wildfire risk reduction efforts, in conjunction with stakeholders and partners, pursuing our shared goal to further reduce wildfire risks in the years ahead.

V. CONCLUSION

While we experienced many challenges in implementing our 2019 Wildfire Safety Plan, we accomplished the essential purpose of the plan – to reduce the risk of catastrophic wildfire for the customers and communities we serve. We have made significant progress in enhancing both organizational and power system readiness and responsiveness to the increased threat of potential wildfires across our service territory. The number of utility-caused wildfires in high fire-threat areas of PG&E's service territory declined materially in 2019 and there was no repeat of the deadly catastrophic wildfires that devastated Northern California in 2017 and 2018. We are working to sustain and build on this progress, to minimize disruptions to customers and benefit all Californians. We look forward to partnering with the CPUC and other stakeholders to further reduce wildfire risk.

Matthew Pender

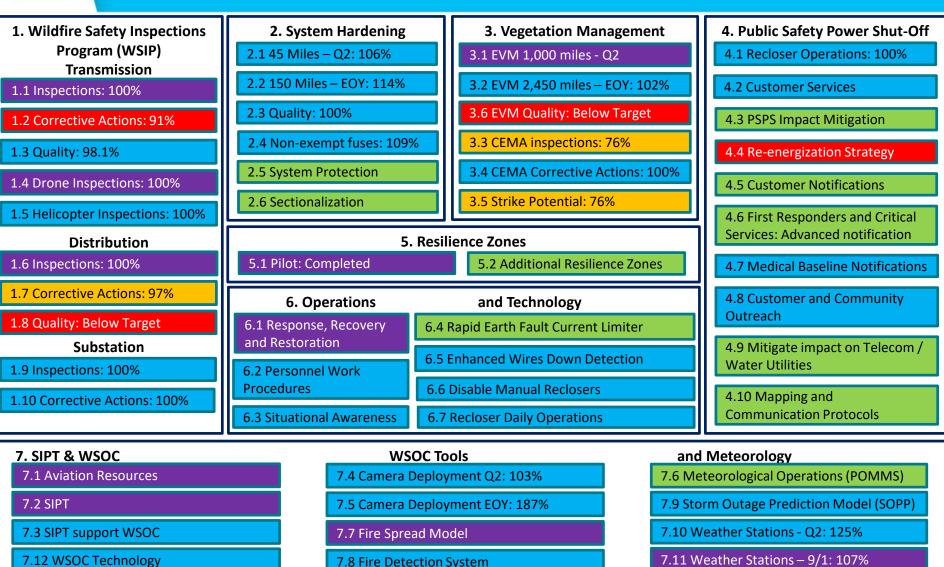
Sincerely,

Matthew Pender

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2019 Wildfire Safety Plan Initiative Performance



All information provided in this update reflects full-year 2019 data as of 3/20/2020, further validation & quality reviews may result in data changes

Color Legend: Completed on Time Completed Late On Track At Risk or Substantially Complete Not Completed



Wildfire Safety Inspections Program (WSIP)

1.1 Transmission Inspections
100%
Completed Late

1.2 Transmission Corrective Actions 91%

Partially Complete

1.3 Transmission Quality

98.1% "Passed"

Completed

1.4 Drone or Helicopter Aerial Inspections 100%

Completed Late

1.5 Helicopter Inspections

Completed

1. Wildfire Safety Inspections Program (WSIP) - Transmission

Complete a WSIP enhanced inspection of all ~50,000 structures

2019 WSP Commitment: Complete all enhanced visual inspections by 05/01/19.

2019 Performance: All inspections completed, however final aerial inspections not completed until December.

Complete all high priority corrective actions (A and B tags) identified during these inspections

2019 WSP Commitment: Complete all A tag and B tag (>5,000) repairs identified from WSIP enhanced inspections by 5/31; excluding tags on deenergized or 3rd party-owned lines.

2019 Performance: Completed all priority A and over 90% of priority B corrective actions in 2019 (excluding open tags on de-energized lines where no hazard exists). Some B tags (~500) will be completed in 2020, due to a combination of factors, including when PG&E was permitted to take lines out of service and the diversion of resources to PSPS events.

Achieve a 98 percent "meets expectations" performance during internal audits

2019 WSP Commitment: Quality performance measured by Internal Audit nonconformance report of findings that represents a violation of a policy, procedure, standard or other applicable legal or regulatory requirement.

2019 Performance: Electric Quality Control identified 2 priority 'B' and 27 priority 'E' record nonconformance out of 244 transmission records that contained 1,550 attributes, no high risk nonconformances were found. Overall compliance score of 98.1% met the target of 98%.

<u>Drone inspections will be conducted on every structure in the WSIP scope, subject to any FAA restrictions that cannot be resolved</u>

2019 WSP Commitment: Complete all WSIP aerial enhanced inspections of in-scope structures by 05/01/19.

2019 Performance: All Transmission aerial inspections of 49,760 structures were completed, but some after the deadline. Final inspections completed in December as helicopters were utilized at Air Force bases and municipal airports, after extensive discussions, as an alternative inspection method due to restricted drone access.

<u>Helicopters will be used for additional aerial inspections for collecting infrared data to determine hot spots on conductors, insulators, and connectors requiring repair</u>

2019 WSP Commitment: High resolution infrared cameras mounted on helicopters utilized to assess for hot spots (e.g. lose/poor connections) on both summer and winter peaking lines. Scope of work is ~20% of all overhead assets (assets are reviewed on a 5-year cycle).

2019 Performance: All 2019 transmission helicopter inspection were completed. Further, as part of the winter and summer readiness scope, operational engineers review circuits' potential for overload conditions.



Wildfire Safety Inspections Program (WSIP)

1. Wildfire Safety Inspections Program (WSIP) – Distribution and Substation

1.6 Distribution Inspections
100%
Completed Late

1.7 Distribution Corrective Actions

97%

Substantially Completed

1.8 Distribution Quality

96.7%

Below Target

1.9 Substation Inspections

100%

Completed on Time

1.10 Substation Corrective Actions

100%

Completed on Time

Complete a WSIP enhanced inspection of all ~685,000 poles in the HFTD areas by 05/31/19

2019 WSP Commitment: Complete all enhanced visual inspections by 05/01/19.

2019 Performance: Inspections of all 694,250 poles completed, final inspections completed in August.

Complete high priority corrective actions (A and B tags) created from deficiencies identified resulting from these enhanced inspections by June 30, 2019

2019 WSP Commitment: Complete all A and B tag (~5,000) corrective actions as defined by the Centralized Inspection Review Team (CIRT) review (excludes B tags created to track locations where initial inspection could not access assets).

2019 Performance: Completed all ~1,000 high priority "A" tags and majority of ~4,000 "B" Tags in 2019. A small volume of "B" Tags (165) will be completed in 2020, due to a combination of factors, including inclement weather; the availability of equipment, materials, and qualified personnel; objections from property owners or governmental agencies; and environmental permitting requirements.

Achieve a 98 percent "meets expectations" performance during internal audits

2019 WSP Commitment: The quality of Distribution WSIP inspections will be validated through Work Validation Reviews of WSIP inspection work and will report on findings that represents a policy, procedure, or standard violation.

2019 Performance: There were 3 high significance findings and 45 medium significance findings identified through 1,451 reviews (1,067 field reviews and 384 records reviews) resulting in a total 96.7% quality score, below the 98% target. As a result of missing this target, PG&E commissioned an independent third-party evaluation of its WSIP inspections and is engaged in a quality assessment effort that includes thousands of re-inspections.

Complete WSIP enhanced inspections for all (~200) substations located in HFTD areas, by 05/01/19

2019 WSP Commitment: Complete all substation enhanced visual inspections by 05/01/19

2019 Performance: All Substation (222 locations) inspections were completed on time (04/29/19) with a specific focus on the failure mechanisms for transformers, conductors, connectors, insulators, switches, poles, and other equipment that could result in fire ignitions.

Complete all high priority corrective actions (A and B tags) created from deficiencies identified resulting from these enhanced inspections by 05/31/19

2019 WSP Commitment: Complete all A and B tag (~700) repairs as defined by the Centralized Inspection Review Team (CIRT) review.

2019 Performance: As of 05/31/19 had completed all high priority A tags (101) and B Tags (645) identified to date. Further reviews resulted in additional B tags that are being worked on standard completion schedules.



System Hardening

2. System Hardening

2.1 SH – Q2 Target

106%

Completed on Time

2.2 SH – Q4 Target 114% Completed on Time

2.3 Quality Expectations

Passed

Completed

2.4 SH - Equipment 113% Completed

2.5 System Protection

On Track

2.6 Sectionalization (Distribution)

228 devices

On Track

Complete 45 miles in HFTD areas by 6/30/19

2019 WSP Commitment: Implement System Hardening standard by (1) replacing overhead (OH) circuits with insulated conductors, appropriately sized poles and covered secondary, (2) converting OH circuits to underground (UG), or (3) retiring/removing OH assets where customers can be served by other means (e.g. distributed generation, microgrid). **2019 Performance**: While this commitment was noted as unlikely to achieve in PG&E's 5/31 Notice to the CPUC, potential execution risks were mitigated and 47.7 miles were completed and quality validated by 06/30/19.

Complete an additional 105 miles for a total of 150 miles in HFTD areas by 12/31/19

2019 WSP Commitment: Same criteria as 2.1 to achieve total of 150 miles by end of year.

2019 Performance: Completed 171 miles and passed quality validation by 12/31/19.

Achieve a 100 percent "meets expectations" performance during internal audits

2019 WSP Commitment: Both QC and Internal Audit reviews will take place for all System Hardening miles. Any identified quality concerns are reworked before the mileage is counted towards the reported System Hardening miles.

2019 Performance: QC and Internal Audit reviews successfully completed for all 171 miles completed by 12/31/19.

Replace approximately 625 non-exempt fuses/cutouts in HFTD areas (each year for 7 years)

2019 WSP Commitment: Replace a minimum of 625 non-exempt fuses/cutouts in HFTD areas by 12/31/19.

2019 Performance: 706 non-exempt fuses were replaced in HFTD areas by EOY, surpassing 625 target.

Automate the remaining non-SCADA TripSavers serving the Tier 2 and Tier 3 HFTD areas, in 2020

2019 WSP Commitment: Prepare to complete this work in 2020

2019 Performance: During 2019 engineering analysis determined that instead of SCADA-enabling these TripSavers they will be reprogrammed in 2020. By EOY, engineering completed creation of new electronic settings files for remaining 278 locations. By start of 2020 fire season (June 1, 2020) forecast to have uploaded all electronic settings files via Bluetooth, thereby completely removing their reclosing functionality and converting them into electronic fuses.

Installation of additional line reclosers at Tier 2 and Tier 3 HFTD boundaries

2019 WSP Commitment: Install additional sectionalizing devices. No specific target was set for the number of devices in the WSP. These new SCADA-enabled devices will be a combination of Line Reclosers, FuseSavers, and Motorized Switch Operators (MSO).

2019 Performance: PG&E operationalized 228 new SCADA-Enabled sectionalizing devices (91% of the internal target of 250). An additional 65 devices were installed in the field but not SCADA Enabled or released to operations as of EOY.



Vegetation Management

3. Vegetation Management – Enhanced Vegetation Management (EVM)

3.1 EVM 1,000 Miles
- Q2
100%
Completed Late

Perform enhanced vegetation management (EVM) work on approximately 1,000 circuit miles in HFTD areas, by 6/30/19 2019 WSP Commitment: Complete 1,000 circuit miles of enhanced vegetation cleared consistent with the EVM program scope, within high-fire risk areas to reduce wildfire risk through (1) overhang clearing within 4ft from conductor to sky, (2) 12 ft radial clearing around the conductor, and (3) hazard tree mitigation.

2019 Performance: Completed late. As of June 30th ~484 miles were validated as completed. In October the 1,000 mile threshold was crossed.

3.2 EVM – 2,450 Miles by EOY 102%

Completed on Time

Perform enhanced vegetation management (EVM) work on a total of 2,450 circuit miles in HFTD areas, by 12/31/19 2019 WSP Commitment: Same criteria as 3.1 to complete EVM work on 2,450 circuit miles by 12/31/19.

2019 Performance: PG&E completed and validated 2,498 circuit miles as cleared to EVM scope.

3.6 EVM Quality

63%

Below Target

Achieve a 92 percent "meets expectations" performance in EVM QA audits

2019 WSP Commitment: QA review performed on 100 percent of EVM work. Any trees found to have been missed or incorrectly worked through the QA reviews will be reworked to meet the relevant program scope.

2019 Performance: Throughout 2019 PG&E performed work verification on every mile of EVM work completed in the field. The "first pass" quality results of this work verification process were ~60% for the year. Any miles that did not pass the initial work verification were reworked and re-work verified before they were considered complete. Based on this 60% "first pass" quality score this commitment is being considered "below target".

To mitigate for identified quality challenges, in Q4 an additional Quality Assurance (QA) review process was implemented and assessed approximately 230 miles (~9% of work completed in 2019) of work that had passed work verification and were being counted as complete. These QA assessments identified that 98% of miles had been properly assessed and worked according to company standard.



Vegetation Management

3. Vegetation Management – continued

3.3 CEMA Inspections

76%

Substantially Completed

Complete 100 percent of VM CEMA patrols (inspections) for dead or dying trees "CEMA Trees"

2019 WSP Commitment: Complete CEMA Inspections within targeted areas.

2019 Performance: VM completed ~76% of originally planned CEMA inspections (the 2nd inspection of the year for each applicable circuit) on a mileage basis and identified ~50,000 tree units requiring work. All circuits and trees tall enough to strike lines were inspected at least once in 2019. However, CEMA inspections are targeted to occur 6 months after routine 1st patrol of a circuit. Risk-informed changes to the 2019 Routine (i.e. 1st) inspection schedule during Q1, and delays in executing the routine schedule during Q1 and Q2, resulted in associated rescheduling of some CEMA (i.e. 2nd) inspections from the second half of 2019 into early 2020. All circuits and trees in HFTD remain on a generally twice per year inspection cycle, although a small volume was only inspected once in the 2019 calendar year.

3.4 CEMA Corrective Action 100%

Completed on Time

Removing or working all dead or dying trees ("CEMA trees") identified by 10/01/19

2019 WSP Commitment: For all tree work identified by CEMA inspections as of 10/01/19, complete work by 12/31/2019. Excludes trees where tree work is delayed by third party delays, including environmental permitting requirements, owner refusals, and agency approval or review.

2019 Performance: Completed ~48,000 CEMA tree work units, including all tree work identified by CEMA inspections before 10/1, with the exception of approximately 1,839 trees where work completion has been delayed due to 3rd party constraints.

3.5 Assess Trees with Strike Potential

76%

Substantially Completed

Inspect all Trees with a Potential Strike Path to Power Lines

2019 WSP Commitment: Assess the more than 100 million trees with potential strike path through completion of on all CEMA inspection within targeted areas.

2019 Performance: See notes above for 3.3, completed ~76% of planned CEMA inspections, on a mileage basis. As noted: all circuits and trees in HFTD remain on a generally twice per year inspection cycle, although a small volume was only inspected once in the 2019 calendar year.



Public Safety Power Shutoff (PSPS)

4. Public Safety Power Shutoff (PSPS)

4.1 Recloser Operations 100%

Completed on Time

SCADA-enabling all remaining, active/operational line reclosers (~285) in Tier 2 and Tier 3 HFTD areas, by 06/01/19
2019 WSP Commitment: Install SCADA (Supervisory Control and Data Acquisition) functionality on all line reclosing devices in Tiers 2 and 3 which are not currently SCADA-enabled.

2019 Performance: Completed SCADA enabling on all 287 remaining manual reclosers by 5/30.

4.2 Customer Services

Completed

4.3 PSPS Impact Mitigation

On Track

4.4 Re-energization Strategy

Not Completed

Continuously refine and further develop strategies that minimize the extent of disruption of grid power

2019 WSP Commitment: Define and document the following six new program workstreams in the 2019 Customer Program Playbook and implement during PSPS events: 1) Back Up Generation (OEM, Retail and Technology Partnerships), 2) Back Up Generation (Continuous Power Programs), 3) Collaborative Community Support (Community Resource Centers), 4) Support programs (Access & Functional Needs community), 5) Partnership with Critical Services providers and 6) Coordination with 3rd-Party Commodity Suppliers (CCAs).

2019 Performance: Implemented improved strategies across workstreams during September, October & November PSPS events.

Identify and prioritize mitigation of PSPS impacts to customers where de-energizing the line will not result in a realized wildfire risk reduction

2019 WSP Commitment: All sectionalizing devices being installed as part of initiative 2.6 within System Hardening are designed to isolate Tier 2 and Tier 3 HFTD areas.

2019 Performance: Aligns with initiative 2.6 within "System Hardening". This effort is prioritized based on total number of customers who would otherwise be impacted by PSPS that can benefit from sectionalizing devices. Note that prioritization analysis for sectionalizing devices will continue to be refined each year based on improved analysis and information.

Re-energize only when confirmed safe to do so and only after protection zones are patrolled and clear of defects or damage. Prioritize as directed to maximize public safety and minimize outage impacts and duration.

2019 WSP Commitment: Confirm it is safe to re-energize circuit by conducting a patrol, which is a visual assessment of the lines to ensure segments are clear of defects and/or damage.

2019 Performance: This issue was fully described in PG&E's second amendment filed on April 25th, with the key proposed amendment being that instead of positively inspecting every circuit that is de-energized during PSPS events, "PG&E will exercise operational judgment to determine whether distribution lines in areas that did not experience the PSPS triggering conditions but were only interrupted because of the de-energization of other lines should be patrolled."



Public Safety Power Shutoff (PSPS)

4. Public Safety Power Shutoff (PSPS) - continued

4.5 Customer Notifications

On Track

Attempt to send notifications to all potentially impacted customers

2019 WSP Commitment: Attempt to send notifications to all customers identified as being in scope of a PSPS event **2019 Performance**: PG&E attempted to send notifications to all customers impacted by PSPS events in 2019. During the largest, October 2019, PSPS events ~ 3% of total impacted customers were not contacted. PG&E is working to improve data accuracy and resolve abnormal circuit configuration issues and reaching out to customers without contact information to request they update their information.

4.6 First Responders and Critical Services

On Track

Attempt to notify First Responders, Healthcare Facilities, Telecommunication Providers and Water Utilities in advance of residential notifications prior to a PSPS event

2019 WSP Commitment: For each PSPS event in 2019, attempt to notify critical service providers.

2019 Performance: PG&E was generally successful at sending notifications to all impacted critical service providers during 2019 PSPS events but identified several lessons learned and areas for improvement for 2020 and beyond.

4.7 Medical Baseline Notifications Attempt to provide additional notifications to life support/medical baseline (MBL) customers prior to a PSPS event if general notifications are unsuccessful

Completed

2019 WSP Commitment: Maintain up to date contact information and provide the necessary tools and processes to support the additional notification / outreach to MBL customers expected to be impacted by a PSPS event, including rolling trucks to knock on doors of MBL customers if they do not confirm receipt of prior notice attempts via phone, text or email.

2019 Performance: PG&E had documented and implemented processes in place to provide additional notifications to life support and MBL customers throughout 2019 PSPS events.

4.8 Notification Tools

Refine customer notification tools and educate customers and communities to prepare for PSPS execution

2019 WSP Commitment: Deploy pre-wildfire season outreach efforts, including open houses, webinars, and direct mail/email campaigns to prepare customers and communities for PSPS events. Document processes, testing, functionality and use of notification tools for PSPS events.

Completed

2019 Performance: PG&E successfully executed a pre-wildfire season outreach and engagement plan and then implemented improved notification functionality throughout the 2019 PSPS events. Improvements during 2019 included streamlining the notifications, providing a multi-premise view of impacted addresses, and providing updated scripts with links to PSPS event maps for public safety partners.



Public Safety Power Shutoff (PSPS)

4. Public Safety Power Shutoff (PSPS) - continued

4.9 Mitigate Impact on Telecom / Water Utilities

On Track

Proactively identify PSPS impacts to critical customers and services that support emergency response and preparedness

2019 WSP Commitment: Ensure accurate contact information is on file for notification purposes and provide resources (advanced notification expectations, GIS planning maps, fact sheets, websites) for emergency preparedness planning that clarifies the process for engagement and the information received during a PSPS event.

2019 Performance: During 2019 PSPS events, PG&E implemented the advanced notices with Public Safety Partners (PSPs) and Critical Facilities, including engagement with CCAs, telecommunication service providers and transmission customers. Further improvements for critical service provider engagement were identified through the October events, such as granting access to the PSPS data portal for Telecommunication providers

4.10 Mapping and Communication Protocols

On Track

Ensure sufficient mapping, planning and communication protocols are developed prior to potential PSPS initiation

2019 WSP Commitment: Develop protocols to provide event-specific maps, depicting areas under consideration for potential de-energization, to state and local officials as well as the public. Provide planning maps in advance of events for use by local officials and public safety partners for planning purposes. Develop robust communications protocols and procedures to support timely notification and communication to all stakeholders, from public safety partners to residential customers, in advance of a given PSPS event. Communications media include a combination of automated calls, emails, texts, and where applicable and appropriate live calls to public safety partners.

2019 Performance: In 2019 PG&E provided impact maps in the PSPS data portal first with availability to the public as PSPS event notifications expanded. PG&E is currently working towards adding additional circuit-level information to the online PSPS portal site for advanced notification to public safety partners, and to the public through the pge.com website.



Resilience Zones

5. Resilience Zones

5.1 Resilience Zone - Pilot

Completed Late

Operationalize one resilience zone by June 1, 2019. Evaluate performance and effectiveness through post event review. Incorporate learnings into future Resilience Zone establishment.

2019 WSP Commitment: The operationalization target is met when the first resilience zone becomes ready to use during PSPS. To reach readiness, the following needs to be complete:

1) installation of sectionalizing devices to enable isolation of the intended area from the rest of the distribution grid during PSPS, 2) installation of a pre-installed interconnection hub to enable the rapid connection of mobile generation during PSPS and 3) completion of any necessary hardening treatment(s) to enable safe energization of the intended area during PSPS weather conditions.

2019 Performance: As of 09/24/2019, PG&E's first resilience zone pilot project (in Angwin, Napa County) was completed and ready to be operated during relevant PSPS events. This pilot Resilience Zone in Angwin was operated during the three PSPS Events in October 2019 in which the adjacent area was in-scope for de-energization (Oct 05, Oct 23, and Oct 26-29).

5.2 Additional Resilience Zones

On Track

Continue efforts to develop Resilience Zones in other towns in alignment with system hardening and targeted sectionalizing efforts

2019 WSP Commitment: PG&E is continuing efforts to develop additional Resilience Zones.

2019 Performance: PG&E has four additional resilience zone sites currently in the implementation phase with an operationally-ready target date in 2020. Additionally, during 2019 PSPS events PG&E was able to safely operate three additional temporary microgrids in communities that do not yet have pre-installed interconnection hubs (PIHs). While these sites were not considered Resilience Zones (because they did not leverage fully pre-engineered infrastructure), they achieved the same purpose, which is to energize islanded zones within communities impacted by PSPS events and thereby enable some community resources (e.g. commercial corridors and critical facilities) to continue serving the nearby population.



Operations

6. Operations

6.1 Response, Recovery and Restoration To respond more quickly and effectively to major wildfires, regardless of the source of ignition (e.g., third party, lightening, etc.), and to prepare to rebuild and recover from a disaster safely, efficiently, effectively, and consistently. PG&E's plan is to be ready to meet this objective by June 1, 2019 by developing the wildfire response and post-incident recovery capabilities described in this Plan

Completed Late

2019 WSP Commitment: Have plans in place and ready to deploy to support rapid, well-coordinated response and recovery activities for wildfire impacted communities.

2019 Performance: While previous rebuild and recovery plans were operationally in place by 6/1/19, as of 9/26/19, PG&E had updated its wildfire response and post-incident recovery capabilities, documented in the Company Emergency Response Plan (CERP). PG&E has enhanced and documented its commitment to support timely, well-coordinated activities between Service Planning & Design, Gas and Electric Construction, and External Engagement, as documented in PG&E's Disaster Rebuild Annex.

6.2 Personnel Work Procedures

Completed

<u>Update guidance in TD 1464S and verify annual refresher training is completed for all field employees in advance of exposure to elevated wildfire risk conditions.</u>

2019 WSP Commitment: Update guidance document TD-1464S, regarding operational practices during elevated fire risk conditions, and implement to operational teams across the company.

2019 Performance: Leading up to the 2019 wildfire season, PG&E refreshed field employee and contractor teams on safe operations during wildfire risk conditions through in-person Wildfire Season Readiness Kick-off meeting. PG&E finalized a comprehensive update to guidance document TD 1464S and associated Safety training courses in August 2019. PG&E also verified that field employee annual refresher training on safe operations during wildfire risk conditions was completed.

6.3 Situational Awareness

Incorporate wildfire risk situational awareness into daily briefings

2019 WSP Commitment: Incorporate wildfire risk situational awareness into daily briefings..

Completed

2019 Performance: As of 06/19/2019, PG&E's WSOC had incorporated wildfire risk situational awareness into Distribution and Transmission daily briefings. The Wildfire Incident report includes fire conditions, fire locations, assets at risk, potential impact, and outage information pertaining to active incidents.



Technology

6. Technology

6.4 Rapid Earth Fault Current Limiter, Pilot

On Track

Implement R&D Rapid Earth Fault Current Limiter (REFCL) pilot project

2019 WSP Commitment: REFCL is a technology that rapidly reduces the energy in certain three-wire overhead distribution systems when it detects phase-to-earth faults, reducing the risk of an ignition. PG&E planned to begin engineering and design work in 2019 for pilot field implementation of this technology in 2020.

2019 Performance: PG&E completed the four key components of preparations for 2020 pilot field implementation: 1) Civil design, 2) Electrical substation design, 3) Ground Fault Neutralizer (GFN) and substation regulator specifications, and 4) Contract awarded. 2020 workplan includes system installation, release to operations and activation of SCADA functionality.

6.5 Enhanced Wires Down Detection

100%

Completed

Enhanced Wires Down Detection Project

2019 WSP Commitment: Deliver the phase 1 scope of the project, SmartMeter Partial Voltage (PV) alert functionality (firmware) deployed to provide Operations and Dispatch situational awareness of a majority of single-phasing conditions that may indicate the occurrence of a wire down event.

2019 Performance: PG&E had successfully deployed the Phase 1, enhanced wires down alert functionality (firmware) to over 4.5 million SmartMeters by the end of March.

6.6 Disable Manual Reclosers

100%

Completed

Disable any remaining manual reclosing devices in advance of exposure to elevated wildfire risk conditions.

2019 WSP Commitment: Disable manual reclosing devices (both Distributing and Transmission) by the beginning of the Wildfire Season (05/31/2019).

2019 Performance: Note that commitment 4.1 "Recloser Operations" had SCADA enabled the majority of active / operational line reclosers in the Tier 2 and Tier 3 HFTD areas, by 05/29/2019. The small volume of remaining manual reclosing devices were deactivated prior to wildfire season.

6.7 Recloser Daily Operations

100%

Completed

Recloser daily operations conformance with TD-1464B-001 and monitor program for effectiveness

2019 WSP Commitment: Recloser daily operations conform to TD-1464B-001 and monitor program for effectiveness. **2019 Performance**: As of 09/30/2019, PG&E implemented a change in the process to disable reclosing during period of potential fire risk. Rather than disabling the devices that feed into Tier 2 and Tier 3 based on local conditions, PG&E has disabled all reclosing devices that feed into Tier 2 and Tier 3 for the entirety of fire season. This change exceeded the level of risk reduction implicit in this commitment as PG&E implement this change in order to have even greater assurance that the appropriate devices are disabled during elevated risk conditions.



Situational Awareness

7. Situational Awareness – Safety & Infrastructure Protection Teams (SIPT) & WSOC

7.1 Aviation Resources

Completed Late

Operate four heavy-lift helicopters to aid in fire suppression and restoration efforts by May 2019, available at CAL-Fire's discretion

2019 WSP Commitment: PG&E acquired four heavy-lift helicopters in 2018 and will operate them to respond to agency (e.g., CAL-Fire) requests for PG&E to operate under agency's control to support in the 2019 fire season, unless unavailable.

2019 Performance: As of 06/14/2019, PG&E had 4 heavy-lift helicopters available and authorized by the FAA for operations to

respond to agency (Cal-Fire) request to support fire events in 2019 fire season.

7.2 Safety & Infrastructure Protection Teams (SIPT)

Completed Late

<u>Safety & Infrastructure Protection Teams (SIPT)</u>

2019 WSP Commitment: Obtain and operate a minimum of 25 trucks + 3 trucks for extra coverage and the capability of type 6 wildland engines, staffed with 60 employees through an internal PG&E SIPT in partnership with International Brotherhood of Electrical Workers (IBEW)

2019 Performance: As of 07/19/2019, PG&E had 28 trucks operational and over 60 employees staffed to further support SIPT.

7.3 SIPT support

WSOC

Completed

SIPT Support of the Wildfire Safety Operations Center (WSOC)

2019 WSP Commitment: The SIPT will assist in WSOC decision making by acting as observers on high-fire risk days to inform PSPS decision making, protect PG&E assets, and assist with emergency response as approved and directed by the Agency Having Jurisdiction (AHJ) e.g. CAL FIRE

2019 Performance: As of July SIPT teams were in place with these activities as part of their normal work duties. Further, by October, PG&E had developed and operationalized two tools that allowed STIP crews to submit field observations and a comprehensive view of those field observations to WSOC analysts to further inform wildfire risk assessments and PSPS decision making.

7.12 WSOC

Completed

WSOC Technology Implementation

2019 WSP Commitment: Increase situational awareness by integrating technology and processes intended to reduce wildfire risk into the WSOC to enable PG&E's collaboration with external and internal stakeholders and respond more effectively to wildfires

2019 Performance: As of 11/30/19, PG&E's WSOC had implemented new technology into the Wildfire Incident Viewer (WIV) tool, that allow for additional situational awareness of the ignitions, as they occur throughout the service territory.



Situational Awareness

7. Situational Awareness – Wildfire Safety Operations Center (WSOC) Tools

7.4 Camera
Deployment – Q2
103%

Completed on Time

HD Cameras by End of Second Quarter

2019 WSP Commitment: Operationalize and install 30 HD cameras by June 30, 2019, in HFTD areas **2019 Performance**: As of 06/30/19, 31 cameras were installed and operationalized in HFTD areas.

7.5 Camera Deployment – EOY

HD Cameras by End of Year

187%
Completed on Time

2019 WSP Commitment: Operationalize and install 71 HD cameras by the end of 2019, in HFTD areas **2019 Performance**: By end of year, 133 HD Cameras had been installed and operationalized in the HFTD areas.

7.7 Fire Spread Model – Phase 1

Completed Late

<u>Deploy operational fire spread modeling, driven by POMMS weather model, to allow improved understanding of catastrophic fire risk before the upcoming wildfire season (June 1, 2019)</u>

2019 WSP Commitment: Deploy an operational fire spread model with weather and fuels information being driven by the PG&E POMMS weather model by June 1, 2019.

2019 Performance: As of 10/04/2019, PG&E had developed and operationalized two operational fire spread models on the vendors server, that use the POMMS weather model data as input in 2019. Further integration and enhancements for ease of tool use occurred through the remainder of 2019.

7.8 Satellite Fire Detection

Completed on Time

Implement Satellite Fire Detection before wildfire season

2019 WSP Commitment: Develop, deploy, and maintain an automated tool to detect and track new fires as they occur, issue alerts about new fires, as well as simulate the potential spread of new and existing fires before the upcoming wildfire season. **2019 Performance**: As of June, PG&E had developed and operationalized an automated satellite fire detection and alerting system tool available on PG&E's intranet. When a new fire is detected the system disseminates email alerts to applicable areas and PG&E leadership.



Situational Awareness

7. Situational Awareness - Meteorology

7.6 Meteorological Operations

On Track

Deploy enhanced PG&E Operational Mesoscale Modeling System (POMMS) if accuracy can be improved

2019 WSP Commitment: Deploy the next generation of weather forecasting using High Performance Computer capabilities (i.e. supercomputers) or cloud computing.

2019 Performance: PG&E implemented POMMS enhancements in the first half of 2019. In the second half of 2019 PG&E kicked off a project to further build out POMMS 3.0 in the cloud using supercomputing resources. Planned completion in mid-2020. Vendors have been selected for system deployment

7.9 Storm Outage Prediction Model (SOPP)

Completed

Automate analog storm matching and prediction functions in the SOPP model

2019 WSP Commitment: The automated analog storm matching tool being implemented utilizes the latest forecast from the federal Global Forecast System (GFS) and matches the storm variables against historical data. The 'Outage Producing Wind' (OPW) model returns the historical outage frequency in an area based on the forecasted wind speed.

2019 Performance: As of June, PG&E had developed and operationalized the automated analog storm matching and prediction functions in the SOPP model.

7.10 Weather Stations – Q2

125%

Completed on Time

Weather Stations by End of Second Quarter

2019 WSP Commitment: Install 200 weather stations by June 30, 2019, in HFTD areas

2019 Performance: As of 06/30/19, PG&E had installed and operationalized 249 weather stations

7.11 Weather Stations – Sept 1 107%

Completed Late

Weather Stations by September 1

2019 WSP Commitment: Install 400 weather stations by September 1, 2019, in HFTD areas

2019 Performance: PG&E completed this initiative just a few days late, as the 400th weather station was installed by 09/04/19. By the end of 2019 426 weather stations had been installed and operationalized.

ATTACHMENT B

Yu, Amy (Law)

Cc:

Thomas, Sarah R. <sarah.thomas@cpuc.ca.gov> From:

Sent: Tuesday, April 07, 2020 2:32 PM

To: Yu, Amy (Law); Morey, Candace; Contreras, Carolina; Rucker, Catherine; TerKeurst, Charlotte; Lukins,

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EBorden@turn.org **ALJ Docket Office**

Subject: Re: R.18-10-007, PG&E's 2019 WMP Compliance Report

*****CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.****

Ms. Yu - please file this document in proceeding R.18-10-007, and include this email message with the filing.

Sarah R. Thomas, Esq. Administrative Law Judge California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102 415 703-2310 srt@cpuc.ca.gov cpuc.ca.gov

From: Yu, Amy (Law) <ASY2@pge.com> Sent: Wednesday, April 1, 2020 2:27 PM

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Case 3:14-cr-00175-WHA Document 1260-2 Filed 11/03/20 Page 29 of 29

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Subject: R.18-10-007, PG&E's 2019 WMP Compliance Report

To All Parties in R.18-10-007:

Attached is Pacific Gas and Electric Company's 2019 WMP Compliance Report submitted to Caroline Thomas Jacobs, Director of the Wildfire Safety Division, California Public Utilities Commission. PG&E is serving a copy of its compliance report upon all parties who have provided an electronic mailing address listed on the official service list for R.18-10-007. Amy S. Yu, on behalf of

Alyssa Koo

Pacific Gas and Electric Company

If you have any difficulty opening the attachment(s), please notify Amy S. Yu, tel (415) 973-2769, fax (415) 973-5520, Amy.Yu@pge.com.

NOTE: The recipient portion of this e-mail does not reflect all the addressees who are being served. The service list has been split into 50-addressee groups, to avoid rejection by CPUC and other e-mail servers.

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